

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

BREATHABLEBABY, LLC,

Plaintiff,

v.

CROWN CRAFTS, INC. and CROWN
CRAFTS INFANT PRODUCTS, INC.,

Defendants.

Civil Action No.: 0:12-cv-00094-PJS-TNL

JURY TRIAL DEMANDED

DECLARATION OF KYLE LIUDAHL IN SUPPORT OF PLAINTIFF'S
MEMORANDUM IN SUPPORT OF MOTION TO COMPEL

I, Kyle Liudahl, declare as follows:

1. Attached hereto as Exhibit 1 is a copy of Plaintiff's First Set of Request for Production of Documents and Things to Defendants.
2. Attached hereto as Exhibit 2 is a copy of Defendants' Responses and Objections to Plaintiff's First Set of Request for Production of Documents and Things.
3. Attached hereto as Exhibit 3 is a copy of Plaintiff's Second Set of Requests for Production of Documents and Things to Defendants (NOS. 51-58).
4. Attached hereto as Exhibit 4 is a copy of Defendants' Responses and Objections to Plaintiff's Second Set of Requests for Production of Documents and Things (NOS. 51-58).
5. Attached hereto as Exhibit 5 is a copy of Plaintiff's First Set of Interrogatories to Defendant.

6. Attached hereto as Exhibit 6 is a copy of Defendants' Responses and Objections to Plaintiff's First Set of Interrogatories.
7. Attached hereto as Exhibit 7 is a copy of Plaintiff Breathablebaby LLC's Second Set of Interrogatories to Defendants (NOS. 8-18).
8. Attached hereto as Exhibit 8 is a copy of Defendants' Responses and Objections to Plaintiff's Second Set of Interrogatories (NOS. 8-18).
9. Attached hereto as Exhibit 9 are copies of price lists from the September 2011 ABC Kids Expo.
10. Attached hereto as Exhibit 10 is a copy of Bates Doc. No. CC000632.
11. Attached hereto as Exhibit 11 is a copy of Bates Doc. No. CC005639.
12. Attached hereto as Exhibit 12 is a copy of the most recently produced Crown Craft privilege log.
13. Attached hereto as Exhibit 13 is a copy of Bates Doc. No. CC009692.
14. Attached hereto as Exhibit 14 is a copy of testimony from the deposition of Nanci Freeman.
15. Attached hereto as Exhibit 15 is a copy of testimony from the 30(b)(6) deposition of Nanci Freeman.
16. Attached hereto as Exhibit 16 is a copy of testimony from the deposition of Olivia Elliott.
17. Attached hereto as Exhibit 17 is a copy of testimony from the 30(b)(6) deposition of Olivia Elliott.
18. Attached hereto as Exhibit 18 is a copy of testimony from the deposition of Debra Dunne.

19. Attached hereto as Exhibit 19 is a copy of the first page of Bates Doc. No. CC009705.

20. Attached hereto as Exhibit 20 is a copy of Bates Doc. No. CC009034.

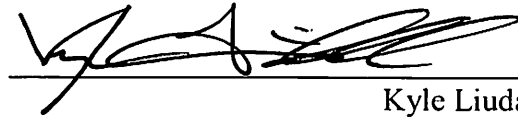
21. Attached hereto as Exhibit 21 is a copy of Bates Doc. No. CC004423.

22. Attached hereto as Exhibit 22 is a copy of Bates Doc. No. CC004392.

23. Attached hereto as Exhibit 23 is a copy of Bates Doc. No. CC002454.

24. Attached hereto as Exhibit 24 is a copy of Bates Doc. No. CC001520.

I declare under penalty of perjury that the foregoing is true and correct. Executed in Minneapolis, Minnesota on February 15, 2012.



Kyle Liudahl